

LAW OFFICE OF
DOUGLAS C. FLADSETH

1160 North Dutton Avenue, Suite 180
Santa Rosa, California 95401

www.medicalmalpracticegroup.com
fladseth@aol.com

Telephone: (707) 545-2600

Facsimile: (707) 545-0552

January 30, 2019

The Honorable Susan Illston
United States District Court, Northern District - San Francisco
450 Golden Gate Ave., 17th Floor, Courtroom 1
San Francisco, CA 94102

Re: Gutierrez v. Santa Rosa Memorial Hospital, et al.
Case No.: 3:16-cv-02645-SI

Dear Judge Illston:

Plaintiffs are hereby requesting that this cause of action be restored to the calendar for further proceedings and are asking for a 60 day extension regarding the 90 day period tolled in the Order of Dismissal Upon Settlement filed by this Honorable Court on 11/8/18. Settlement has not occurred as Defendants are unable to provide a settlement agreement until the petitions for minor's compromise for the minor children and for the special needs trust for Cynthia Gutierrez are granted. Plaintiff's counsel has been unable to file the petitions within the ordered time frame. Additionally, Medi-Cal will not provide Plaintiff with its final lien amount until the Court approves the settlement. Therefore, Plaintiffs hereby request that this matter be restored to the calendar until March 31, 2019.

Respectfully submitted,

/S/

DOUGLAS C. FLADSETH

DCF:dmf

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2019, I will electronically file the foregoing with the Clerk using the CM/ECF system, which will send a notification of filing to the following counsel of record:

BRETT SCHOEL
DIANA KAEMPFER
LA FOLLETTE, JOHNSON,
DE HAAS, FESLER & AMES
655 University Avenue, Suite 119
Sacramento, California 95825
Bschoel@ljdfa.com
dkaempfer@ljdfa.com

Attorneys for Defendants
SANTA ROSA MEMORIAL HOSPITAL
AND ST. JOSEPH HEALTH

JAMES NELSON ESQ
JOSEPH FINKEL ESQ
ALEXANDER M. ARONOV ESQ
SONJIA M. DAHL, ESQ.
DONNELLY NELSON DEPOLO & MURRAY
201 N CIVIC DR SUITE 239
WALNUT CREEK CA 94596
Jnelson@dndmlawyers.com
jfinkel@dndmlawyers.com
aaronov@dndmlawyers.com
sdahl@dndmlawyers.com

Attorneys for
DR. ELLIOT BRANDWENE

JOHN RHODE ESQ
HARDY ERICH BROWN & WILSON
455 Capitol Mall, Suite 200
SACRAMENTO CA 95814
jrhode@hebw.com

Attorneys for TEAM HEALTH, CHASE
DENNIS EMERGENCY MEDICAL
GROUP INC

/S/

Douglas C. Fladseth (SBN 083420)
Counsel for Plaintiffs
LAW OFFICE OF DOUGLAS C.
FLADSETH
1160 North Dutton Avenue, Suite 180
Santa Rosa, California 95401
Telephone: (707) 545-2600
Fax: (707) 545-0552
fladseth@aol.com